REMARKS

Claims 1-6, 8-21 and 23-32 are pending in the application; the status of the claims is as follows:

Claims 1-32 (actually 1-6, 8-21, and 23-32) are rejected under 35 U.S.C. § 102(a) as being unpatentable over U.S. Patent No. 5,748,277 to Huang et al ("Huang et al") in view of U.S. Patent No. 6, 236,385 B1 to Nomura et al ("Nomura et al").

To date, no Notice of Draftsperson's Patent Drawing Review has been received. Applicants respectfully request receipt of this document when it becomes available. Please note that the original drawings filed in the patent application are "formal" drawings.

Claims 1, 9, 16, 24, 31, and 32 have been amended to more particulalry point out and distinctly claim the subject matter of the invention. These changes do not introduce any new matter.

35 U.S.C. § 103(a) Rejection

The rejection of claims 1-32 (actually 1-6, 8-21, and 23-32) under 35 U.S.C. § 103(a), as being unpatentable over Huang et al in view of Nomura et al, is respectfully traversed because there is no motivation to make the combination, and because the combination fails to teach the limitations of the rejected claims.

Huang relates to liquid crystal displays of the type which forms an image by selectively switching liquid crystals to either a focal-conic state or a planar state. *See* column 2, line 60, *et seq*. However, Huang fails to teach that a reset pulse has a pulse width longer than that of the selection pulse. *See* Office Action page 3. In contrast, Nomura relates to liquid crystals of the type which forms an image by selectively switching liquid crystals between two planar states having different twist angles, e.g., a 0-

degree uniform orientation state and a 360-degree twist orientation state. *See* column 11, lines 32-45.

When combining references requires the principle of operation of a reference to be altered, there can be no motivation to make the combination. MPEP which cites *In re Ratti*, 270 F.2d 810, 123 USPQ 349.

Here, Huang teaches to switch a liquid crystal between focal-conic and planar states. This type of display does not need a polarizer to form an image. Nomura teaches to switch the liquid crystal between two planar states having different twist angles, e.g., 0° and 360°. In this type of display the polarity of light passing through the liquid crystal is depends on the twist angle, and a polarizer is used to block light of one polarization while passing light of the other polarization. Clearly, the two references have different principles of operation, so that the principles of operation of one of the references would have to be changed before they could be combined. Accordingly, there can be no motivation to combine Huang and Nomura, and the combination is improper.

Moreover, even assuming *arguendo* that the combination were proper, the combination still fails to disclose, teach, or suggest all elements of the claims. For example, with respect to claim 9, neither reference teaches that a voltage applied to the data lines is below a threshold at which crosstalk occurs. Therefore, the combination fails to disclose, teach, or suggest a method of driving a liquid crystal display device wherein "a voltage applied to the data electrodes is lower than a voltage at which crosstalk occurs," as required by claim 9. Accordingly, claim 9 distinguishes the combination of Huang and Nomura.

With respect to claim 24, Huang and Nomura fail to disclose, teach, or suggest all elements of the claims. For example, neither reference teaches that a voltage applied to the data lines is below a threshold at which crosstalk occurs. Therefore, the combination fails to disclose, teach, or suggest a liquid crystal display device wherein "a voltage

applied to the data electrodes is lower than a voltage at which crosstalk occurs," as required by claim 24. Accordingly, claim 24 distinguishes the combination of Huang and Nomura.

With respect to claim 31, neither reference teaches that a voltage applied to the data lines is below a threshold at which crosstalk occurs. Therefore, the combination fails to disclose, teach, or suggest a method for driving a liquid crystal display device wherein "a voltage is applied to the data electrodes that is lower than a voltage at which crosstalk occurs." Moreover, Huang and Nomurs fail to teach that the reset and evolution pulses are shorter than the selection pulses. Therefore, the references fail to teach a method of driving a liquid crystal display wherein "a pulse applied to the selected one of the scan electrodes during the evolution step has an amplitude which is larger than a maximum amplitude of pulses applied to each of the data electrodes and has a polarity maintaining period which is longer than that of the selection pulse, so that the evolution pulse has an alternating cycle which is longer than that of the selection pulse." Accordingly, claim 31 distinguishes the combination of Huang and Nomura.

With respect to claim 32, it is respectfully submitted that neither reference teaches that a voltage applied to the data lines is below a threshold at which crosstalk occurs. Therefore, the combination fails to disclose, teach, or suggest a liquid crystal display device having a driver that applies AC pulses to the liquid crystal wherein "a voltage applied to the data electrodes is lower than a threshold at which crosstalk occurs" Moreover, Huang and Nomurs fail to teach that the reset and evolution pulses are shorter than the selection pulses. Therefore, the references fail to teach a liquid crystal display device having a driver that applies AC pulses to the liquid crystal, wherein "a pulse applied to the selected one of the scan electrodes during the evolution step has an amplitude which is larger than a maximum amplitude of pulses applied to each of the data electrodes and has a polarity maintaining period which is longer than that of the selection pulse, so that the evolution pulse has an alternating cycle which is longer than that of the

selection pulse." Accordingly, claim 32 distinguishes the combination of Huang and Nomura.

Accordingly, it is respectfully requested that the rejection of claims 1-32 (actually 1-6, 8-21, and 23-32) under 35 U.S.C. § 103(a) as being unpatentable over Huang et al in view of Nomura et al, be reconsidered and withdrawn.

CONCLUSION

Wherefore, in view of the foregoing amendments and remarks, this application is considered to be in condition for allowance, and an early reconsideration and a Notice of Allowance are earnestly solicited.

This Amendment does not increase the number of independent claims, does not increase the total number of claims, and does not present any multiple dependency claims. Accordingly, no fee based on the number or type of claims is currently due. However, if a fee, other than the issue fee, is due, please charge this fee to Sidley Austin Brown & Wood LLP's Deposit Account No. 18-1260.

Any fee required by this document other than the issue fee, and not submitted herewith should be charged to Sidley Austin Brown & Wood LLP's Deposit Account No. 18-1260. Any refund should be credited to the same account.

If an extension of time is required to enable this document to be timely filed and there is no separate Petition for Extension of Time filed herewith, this document is to be construed as also constituting a Petition for Extension of Time Under 37 C.F.R. § 1.136(a) for a period of time sufficient to enable this document to be timely filed.

Any other fee required for such Petition for Extension of Time and any other fee required by this document pursuant to 37 C.F.R. §§ 1.16 and 1.17, other than the issue fee,

and not submitted herewith should be charged to Sidley Austin Brown & Wood LLP's Deposit Account No. 18-1260. Any refund should be credited to the same account.

Respectfully submitted,

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